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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NEXTDOOR.COM, INC.,

Plaintiff,

vs.

RAJ ABHYANKER,

Defendant.

Case No. 3:12-cv-05667-EMC

**NOTICE REGARDING PLAN TO
TRANSITION DISCOVERY TASKS
FROM WITHDRAWING COUNSEL TO
REMAINING COUNSEL OF RECORD**

Courtroom: 2 – 17th Floor
Judge: Honorable William H. Orrick

RAJ ABHYANKER,

Counterclaimant,

vs.

NEXTDOOR.COM, INC., et al.

Counterdefendants.

1 On July 10, 2014, Judge Orrick held an *ex parte, in camera* hearing on the Motion to
2 Withdraw filed by Bruno Tarabichi, Scott Allen, Heather Norton, Brian Orion, and Roy
3 Montgomery (hereinafter “Withdrawing Counsel”). The contents of the hearing are confidential
4 and sealed. At the end of the hearing, Judge Orrick indicated that he would be granting the
5 Motion to Withdraw and requested that Withdrawing Counsel meet and confer with Kuscha
6 Hatami, Mr. Abhyanker’s remaining counsel of record, within 24 hours to arrange for the orderly
7 transition of discovery matters in this case from Withdrawing Counsel to Mr. Hatami and submit
8 to the Court a statement regarding the proposed transition, with the exception that Withdrawing
9 Counsel remain involved solely for the purpose of completing the privilege screen and privilege
10 review of documents scheduled to be produced by July 18th.

11 With regard to Mr. Abhyanker’s document production due on July 18th, Mr. Abhyanker
12 has hired an ediscovery vendor called Blackstone Discovery (“Blackstone”) to perform the
13 searches agreed to by both parties in a joint search protocol. On July 10th, Blackstone informed
14 Mr. Abhyanker that the search had resulted in 7,495 documents (not pages). Today, on July 11th,
15 Mr. Abhyanker has hired another ediscovery vendor called Essential Discovery (“Essential”) to
16 assist with the review of the 7,495 documents through contract attorney resources supervised by
17 counsel. Essential will review documents for privilege before reviewing documents for
18 relevancy. Withdrawing Counsel will provide Essential with Guidance on the privilege screen,
19 and will work with Essential until the privilege screen is complete.

20 Essential has indicated that they will be able to complete the review by July 15th or July
21 16th, which will then provide Blackstone with a day or two to process the responsive to
22 documents for production to Nextdoor by the July 18th deadline. Withdrawing Counsel has
23 provided the agreed-upon search protocol to Mr. Hatami to enable him to take over
24 responsibilities for the production of responsive documents, has introduced Mr. Hatami to the
25 project managers for Blackstone and Essential, and has agreed to make themselves available to
26 Mr. Hatami by phone to answer any questions that may arise as he assumes responsibility for the
27 production of non-privileged documents.
28

1 Dated: July 11, 2013

Respectfully submitted,

2 LEGALFORCE RAJ ABHYANKER, P.C.

3
4 By _____/s/

Bruno W. Tarabichi

5 Heather R. Norton

6 Scott Allen

Brian Orion

7 Roy Montgomery

Kuscha Hatami

8 Attorneys for Defendant

Raj Abhyanker